



BOULT ■ CUMMINGS  
CONNERS ■ BERRY<sup>PLC</sup>

Henry Walker  
(615) 252-2363  
Fax: (615) 252-6363  
Email: hwalker@boultcummings.com

REC'D - TN  
REGULATORY AUTHORITY  
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OFFICE OF THE  
EXECUTIVE SECRETARY

July 12, 2002

The Honorable Sara Kyle, Chairman  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243-0505

In Re: BellSouth Telecommunications, Inc.'s Entry Into Long Distance (InterLATA)  
Service in Tennessee Pursuant to section 271 of the Telecommunications Act of  
1996

Docket No. 97-00309

Dear Chairman Kyle:

Please accept for filing the original and fourteen copies of the Rebuttal Testimony of  
Sherry Lichtenberg filed on behalf of MCI WorldCom Communications, Inc., MCI Metro  
Access Transmission Services, LLC and Books Fiber Communications of Tennessee, Inc.  
(collectively "WORLDCOM") in the above-captioned proceeding.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By:

*Henry Walker*  
Henry Walker

HW/nl  
Attachment

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7/12/2002

LAW OFFICES  
414 UNION STREET • SUITE 1600 • P.O. BOX 198062 • NASHVILLE • TN • 37219  
TELEPHONE 615.244.2582 FACSIMILE 615.252.6380 www.boultcummings.com

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7/16/02

**BEFORE THE  
TENNESSEE REGULATORY AUTHORITY  
Nashville, Tennessee**

In Re: BellSouth Telecommunications, )  
Inc.'s Entry into Long Distance (interLATA) )  
Service in Tennessee Pursuant to Section 271 )  
of the Telecommunications Act of 1996 )

Docket No. 97-00309

**PREFILED REBUTTAL TESTIMONY OF SHERRY LICHTENBERG  
ON BEHALF OF MCI WORLDCOM COMMUNICATIONS, INC.,  
MCIMETRO ACCESS TRANSMISSION SERVICES, LLC, AND  
BROOKS FIBER COMMUNICATIONS OF TENNESSEE, INC.  
(COLLECTIVELY "WORLDCOM")**

1    **Q.    PLEASE STATE YOUR NAME, BUSINESS ADDRESS AND POSITION.**

1    A.    My name is Sherry Lichtenberg. My business address is 701 S. 12<sup>th</sup> St.,  
2            Arlington, Virginia 22202. I am employed by WorldCom, Inc. in the Mass  
3            Markets local services team as a Senior Manager. I will refer to the division of  
4            the company that offers local residential service as "MCI."

5    **Q.    WHAT ARE YOUR RESPONSIBILITIES AT WORLDCOM?**

6    A.    My responsibilities include designing, managing, and implementing MCI's local  
7            telecommunications services to residential customers on a mass market basis  
8            nationwide, including Operations Support Systems ("OSS") testing. I have been  
9            involved in OSS proceedings throughout the country.

10   **Q.    PLEASE DESCRIBE YOUR EMPLOYMENT BACKGROUND.**

11   A.    I have twenty years experience in the telecommunications market, five years with  
12           MCI and fifteen years with AT&T. Prior to joining MCI, I was Pricing and  
13           Proposals Director for AT&T Government Markets, Executive Assistant to the  
14           President, and Staff Director for AT&T Government Markets and had a number  
15           of positions in Product and Project Management.

16   **Q.    WHAT EXPERIENCE DOES MCI HAVE IN OPENING LOCAL  
17           MARKETS TO RESIDENTIAL COMPETITION?**

18   A.    MCI is the only national provider of residential local exchange service in the  
19           United States. MCI had won 1.5 million local residential customers through the  
20           end of 2001 and its goal is to reach 3 million residential customers nationally by  
21           the end of 2002. In BellSouth's region, MCI began providing local residential  
22           service in Georgia in May 2001 and in Florida (on a more limited basis) in

1 November 2001. Beginning in April 2002, MCI launched "The Neighborhood  
2 built by MCI" in thirty-two states, including Tennessee, and has plans to initiate  
3 service in the remaining states by early 2003. This new product provides  
4 Tennessee consumers with packages of local, intraLATA and interLATA voice  
5 services, along with assortments of popular features.

6 **Q. PLEASE PROVIDE THE STATUS OF MCI'S LAUNCH OF LOCAL**  
7 **RESIDENTIAL SERVICE IN TENNESSEE.**

8 A. MCI provides local residential service using the UNE-Platform, also known as  
9 UNE-P, which means that components of BellSouth's network are leased end to  
10 end to provide service to the customer. Initially, MCI worked with another CLEC  
11 that provided the OSS needed to order UNE-P lines from BellSouth in Tennessee.  
12 More recently, MCI has put its own OSS in place so that it now may order UNE-P  
13 lines from BellSouth directly. As a result, MCI is just now beginning to develop  
14 experience with BellSouth's Tennessee OSS.

15 **Q. WHAT IS OSS AND WHY IS IT IMPORTANT?**

16 A. In broad terms OSS has five components: pre-ordering, ordering, provisioning,  
17 maintenance and repair, and billing. "Pre-ordering" involves providing the  
18 information necessary to fill out an order such as the customer's telephone  
19 number and street address number. "Ordering" involves submitting the filled-out  
20 (or "populated") order to BellSouth either manually or electronically. Ideally,  
21 orders are submitted and processed electronically so that manual intervention, and  
22 inevitable human errors, are avoided. "Provisioning" involves execution of the  
23 order and providing the CLEC with notices at certain stages in the provisioning

1 process. For example, a firm order confirmation (known as an "FOC") confirms  
2 that a syntactically correct order has been received; a jeopardy notice alerts the  
3 CLEC to a potential problem with completing the order on time; and a completion  
4 notice confirms that the ordered service has been provisioned. "Maintenance and  
5 repair" obviously deals with service problems that arise after the customer's  
6 service has been turned up. Finally, "billing" functions include providing the  
7 CLEC with customer usage information needed to bill the customer, as well as  
8 wholesale bills for the services BellSouth has provided to the CLEC.

9  
10 OSS is critical to a CLEC's operations. To satisfy its customers, a CLEC must be  
11 able to order service seamlessly so the customer's service is not affected during  
12 the customer's migration from BellSouth to the CLEC and so the CLEC is able to  
13 render an accurate and timely bill. If customers' first experience with a CLEC is  
14 having his or her service disrupted or receiving an incorrect bill, that customer is  
15 apt to return to BellSouth and tell others about their dissatisfaction. Although  
16 OSS issues tend to be technical in nature, their impact on customers -- and  
17 competition -- is real. It is therefore crucial that the Authority ensure that  
18 BellSouth has corrected flaws in its Tennessee OSS before rewarding BellSouth  
19 with a recommendation that it be given authority to offer in-region long distance  
20 service.

21 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

22 A. The purpose of my testimony is to describe the ongoing problems that MCI is  
23 experiencing with BellSouth's OSS in other states. As I will describe, key

1 problems remain and new ones have developed. To the extent CLECs encounter  
2 the same problems in Tennessee, they should be fixed before BellSouth is granted  
3 authority to provide in-region long distance service. Given the Authority's  
4 conclusion that BellSouth's OSS is not regional, the Authority also should satisfy  
5 itself that additional problems are not present in Tennessee before recommending  
6 271 approval.

7 **Q. PLEASE SUMMARIZE SOME OF THE MORE SIGNIFICANT**  
8 **PROBLEMS THAT MCI HAS EXPERIENCED DURING ITS LAUNCH.**

9 A. Most important, BellSouth's change management process remains deficient.  
10 Rather than improving, BellSouth's ability to smoothly implement new software  
11 releases appears to have grown worse since the FCC approved BellSouth's  
12 Georgia/Louisiana 271 application. In particular, BellSouth's software release  
13 10.5 was riddled with defects. In addition, BellSouth has adopted policy changes  
14 that make it more difficult for CLECs to compete. BellSouth recently has  
15 announced that it will reject orders for CLEC customers who request BellSouth  
16 long distance service.

17  
18  
19 **I. BellSouth's Change Management Process Does Not Yet Work.**  
20

21 **Q. WHAT IS CHANGE MANAGEMENT?**

22 A. As a result of the continuous evolution of the telecommunications industry, the  
23 interfaces and processes by which CLECs interact with BellSouth must change as  
24 well. Change management, or change control, is the process by which CLECs  
25 and BellSouth determine which changes are needed, and then implement those

1 changes in such a manner that they do not have significant negative impacts on  
2 CLECs. For example, a good change management process will ensure that  
3 CLECs have sufficient notification of changes to an interface so they are able to  
4 adapt to any such change. Further, a good change management process should  
5 result in few if any defects when software is released for use by CLECs.

6 **Q. HAS KPMG DETECTED CHANGE MANAGEMENT PROBLEMS IN**  
7 **THE FLORIDA THIRD PARTY TEST?**

8 A. Yes. In Florida, KPMG opened Exception 157 because "BellSouth did not  
9 completely test code changes for Releases 10.2 and 10.3 prior to these releases  
10 going into production." KPMG identified 31 defect change requests for release  
11 10.3, for example. KPMG found that "BellSouth's incomplete internal software  
12 testing may affect a CLEC's ability to efficiently execute transactions with  
13 BellSouth, resulting in CLEC customer dissatisfaction."

14 **Q. HAS BELL SOUTH'S CHANGE MANAGEMENT PROCESS IMPROVED**  
15 **SINCE THE FCC APPROVED ITS GEORGIA/LOUISIANA 271**  
16 **APPLICATION?**

17 A. No. If anything, BellSouth's performance has been even worse since the FCC  
18 approved the Georgia/Louisiana application. Release 10.5 is the only release  
19 BellSouth has made since approval of that application. BellSouth was scheduled  
20 to implement release 10.5 on May 18 and 19. BellSouth then delayed the release  
21 until May 31 because it found there were too many software errors to implement  
22 the release on the intended date.  
23

1 Even after this delay, when BellSouth implemented Release 10.5 on May 31, the  
2 release still contained an astounding number of defects. Between May 31 and  
3 June 11, BellSouth released notification for 25 defects. After MCI sent BellSouth  
4 a chart listing these defects, BellSouth acknowledged that 13 of them were  
5 attributable to Release 10.5 (for most of the others, including all of the  
6 documentation defects, BellSouth did not attribute the defects to a particular  
7 release). Subsequently, BellSouth announced two additional systems defects that  
8 it attributed to Release 10.5, as well as 8 documentation defects that it did not  
9 attribute to any specific release. These 8 additional defects were simply listed on  
10 BellSouth's change management web site so they may have been found but were  
11 not announced prior to BST's implementation of Release 10.5. This again points  
12 out BellSouth's inability (or refusal) to identify and announce problems with its  
13 software and documentation to the CLEC community, despite the requirements of  
14 the change management process. Each of these defects impacted CLEC's ability  
15 to prepare and submit orders and, most importantly, their ability to provide  
16 service to their customers.

17 **Q. HOW DOES BELL SOUTH'S CHANGE MANAGEMENT**  
18 **PERFORMANCE COMPARE TO MCI'S EXPERIENCE WITH OTHER**  
19 **CARRIERS?**

20 **A.** This is far from a typical release in the telecommunications industry. In the  
21 Verizon region, for example, a typical release has at most one or two systems  
22 defects. We do not believe there were any tickets opened with respect to recent  
23 Verizon releases. And internally, we consider a release of extremely poor quality



1 if there are more than 10 errors. That is exactly why KPMG opened Exception  
2 157 in Florida after releases 10.2 and 10.3. KPMG similarly found release 10.5  
3 to be of poor quality and left Exception 157 open. KPMG found that for release  
4 10.5, "there were significant defects in the software when releases were placed  
5 into the production environment."

6 **Q. WERE THE DEFECTS IN RELEASE 10.5 SIGNIFICANT?**

7 A. Yes. Many of the defects in Release 10.5 were important. For example,  
8 immediately after implementation of Release 10.5, BellSouth began rejecting all  
9 CLEC to CLEC migration orders. BellSouth rejected *all* orders through its TAG  
10 interface for versions 7.6 or below. BellSouth also rejected orders for new lines  
11 at locations where there is QuickService (working service on the premises or  
12 warm dial tone). And BellSouth rejected all supplemental orders with a building,  
13 pier or wing as part of the address. Such orders are quite common as many  
14 addresses contain a building name. Finally, BellSouth began erroneously rejecting  
15 certain orders.

16 **Q. HAS BELL SOUTH CORRECTED ALL OF THE DEFECTS?**

17 A. No. Although many of these defects were corrected within the first week after the  
18 Release, these defects still caused significant problems in the interim. Other  
19 defects were not even scheduled to be fixed until August 25 or even later. For  
20 example, there is no date yet planned for fixing the defect based on which  
21 BellSouth will incorrectly return an error message on supplemental orders that  
22 contain building, pier, or wing information.

1    **Q.    DOES IT APPEAR THAT BELL SOUTH'S WILL IMPROVE IN ITS**  
2       **NEXT RELEASE?**

3    A.    No. BellSouth's failure to take adequate steps to ensure the quality of its releases  
4       is apparent not only from the defects in Releases 10.5 and earlier releases but also  
5       in BellSouth's planning for Release 10.6. In April BellSouth announced major  
6       changes that it intended to implement in Release 10.6, which was then scheduled  
7       for July. When CLECs requested a delay to the Fall, BellSouth refused to  
8       accommodate them.

9    **Q.    WHAT IS THE NATURE OF THE REQUESTED CHANGE?**

10   A.    The particular changes I am discussing are those designed in part to fix a major  
11       defect to which MCI pointed during the Georgia and Louisiana 271 proceedings.  
12       There we complained about the fact that BellSouth was incorrectly treating some  
13       intraLATA calls of CLEC customers as local calls and had not identified a root  
14       cause or implement a fix for many months. In April BellSouth scheduled a fix for  
15       this problem, as well as other problems.

16   **Q.    HOW DID BELL SOUTH HANDLE THIS CHANGE REQUEST?**

17   A.    Rather than characterizing its fix as a correction to an existing defect, BellSouth  
18       mischaracterized it as based on a regulatory mandate. BellSouth stated that it  
19       intended to implement the fix in July as part of Release 10.6. The problem is that  
20       the change appeared to be a major one that could not be completed successfully in  
21       that time frame. The documentation BellSouth provided pertaining to this release  
22       contained few of the details necessary for CLECs to understand the scope of the  
23       change or what coding changes would be needed on their side of the interfaces. It

1 appeared, however, that the coding changes required would be too substantial for  
2 CLECs to complete successfully prior to the July release. Similarly, it appeared  
3 doubtful that BellSouth could successfully complete the changes on its side by  
4 that time – especially given its past history of poor release quality.

5 **Q. HOW DID MCI RESPOND TO THIS SITUATION?**

6 A. Viewing the “cure” as worse than the disease, MCI asked BellSouth to postpone  
7 implementation of the changes until the Fall. BellSouth responded, however, that  
8 if CLECs did not agree to a July implementation of the changes, BellSouth would  
9 implement the changes until 2003. Faced with this non-choice, CLECs picked  
10 implementation in July over implementation in 2003. This posed a huge risk of  
11 creating major problems, however.

12 **Q. WHAT HAPPENED NEXT?**

13 A. Fortunately, BellSouth ultimately postponed Release 10.6 from July to August 24  
14 The delay will benefit CLECs by providing more time for BellSouth to ensure  
15 smooth implementation of the release and more time for CLECs to prepare for the  
16 change. But the delay did not result from any decision by BellSouth to  
17 accommodate CLECs. Rather it was entirely fortuitous and arose because the  
18 significant problems with release 10.5 delayed the preparation of Release 10.6,  
19 not because BellSouth acceded to CLEC requests.

20 **Q. WHAT DO YOU CONCLUDE FROM THIS EXPERIENCE?**

21 A. The fact is that BellSouth cavalierly believed that a major change could be  
22 adopted in two and a half months and refused to adopt a more reasonable schedule  
23 despite CLEC requests. BellSouth apparently still does not understand the

1 importance of ensuring high quality releases through adequate preparation. The  
2 problem of defect-ridden releases will therefore likely continue to plague CLECs  
3 and significantly diminish their ability to compete effectively.

4 **II. Misrouting of IntraLATA Calls**

5  
6 **Q. WILL RELEASE 10.6 FIX THE PROBLEM WITH THE MISROUTING**  
7 **OF INTRALATA CALLS?**

8 A. No. It is already clear that BellSouth's August release will not fully resolve the  
9 problem with misrouting of intraLATA calls as local calls. In its  
10 Georgia/Louisiana 271 filings at the FCC, BellSouth attributed the misrouted  
11 intraLATA calls as caused by an issue regarding calling scope. BellSouth then  
12 said that this problem did not exist outside of Georgia.

13  
14 On April 17, MCI provided BellSouth an example of 45 intraLATA calls that  
15 were misrouted as local calls in Florida, the only state other than Georgia for  
16 which MCI had experience at the time. On June 24, BellSouth finally responded  
17 to this list. BellSouth acknowledged that 12 of these calls were misrouted as a  
18 result of switch translation problems. That is exactly the explanation BellSouth  
19 originally provided for misrouted calls in Georgia before blaming the misrouting  
20 on issues having to do with calling scope. It is the latter problem that BellSouth  
21 claims it will fix with the release that is now scheduled for August. The  
22 translation problem will not be fixed in August.

1 Moreover, with respect to the remaining 33 calls, BellSouth claims that 31 of  
2 these calls were UNE originated calls to Land to Mobile Numbers and that these  
3 should record as a toll call and be carried by BellSouth as an intraLATA call.  
4 These calls crossed LATA boundaries and terminated in Sprint territory, raising  
5 doubts about this explanation.

6 **III. Single C Process**

7  
8 **Q. WHAT IS THE SINGLE C PROCESS?**

9 A. The single C process reduces the loss of dial tone caused by the existing two  
10 service order process. Under the current process, BellSouth creates a New order  
11 and a Disconnect order from every Local Service Request that CLECs submit for  
12 a UNE-P migration. If these two orders become disassociated or are not  
13 processed at the correct time, the customer can lose dial tone. That is why the  
14 Georgia and Louisiana commissions ordered BellSouth to implement a new  
15 process in which migrations are processed using a single Change or C order.  
16 BellSouth implemented this process for Georgia and Louisiana in March 2002.

17 **Q. HAS BELL SOUTH IMPLEMENTED THE SINGLE C PROCESS IN**  
18 **TENNESSEE?**

19 A. No. BellSouth does not intend to implement single C functionality in Tennessee  
20 until August 2002. In the meantime, MCI customers continue to lose dial tone as  
21 a result of the two service order process.

22 **Q. DO YOU HAVE ANY CONCERNS REGARDING BELL SOUTH'S**  
23 **IMPLEMENTATION OF THE SINGLE C PROCESS IN TENNESSEE?**

1 A. Yes. I am concerned that when BellSouth does implement the change to a single  
2 C process, it will cause significant problems. The change to a single C process in  
3 March in other states caused just such problems – resulting in almost completely  
4 erroneous line loss reports. Hopefully, BellSouth has learned from its mistakes.  
5 But it is not yet clear that BellSouth will be able to implement the single C  
6 process without causing new difficulties.

7 **IV. BellSouth Rejects Orders That Include Requests For BellSouth Long**  
8 **Distance Service**  
9

10 **Q. WHAT IS BELL SOUTH'S POLICY CONCERNING CLEC LOCAL**  
11 **CUSTOMERS THAT WISH TO HAVE BELL SOUTH LONG DISTANCE**  
12 **SERVICE?**

13 A. In Georgia and Louisiana, where BellSouth has been authorized to provide long  
14 distance service, BellSouth is refusing to allow CLEC local customers to request  
15 BellSouth long distance service. On June 14, 2002, BellSouth issued Carrier  
16 Notification SN91083138 announcing that CLEC customers could not order  
17 BellSouth long distance unless the CLEC entered a special "operational  
18 agreement" with BellSouth. BellSouth has not explained the terms of such an  
19 agreement.

20 **Q. HOW IS BELL SOUTH TREATING CLEC ORDERS FOR ITS**  
21 **CUSTOMERS WHO REQUEST BELL SOUTH'S LONG DISTANCE**  
22 **SERVICE?**

23 A. BellSouth is rejecting CLEC orders when customers request BellSouth long  
24 distance service. A number of MCI orders have been rejected for this reason.  
25 Once they are rejected, MCI has no way of correcting the order unless it can

1 persuade the customer to choose a different long distance carrier. In contrast, a  
2 BellSouth local customer can choose any long distance carrier.

3  
4 **V. BellSouth Has Not Shown Its OSS Is Regional**

5  
6 **Q. WHAT HAS THE AUTHORITY CONCLUDED WITH RESPECT TO THE**  
7 **REGIONALITY OF BELL SOUTH'S OSS?**

8 A. After conducting a thorough examination, including an evaluation of the  
9 Pricewaterhouse Coopers attestation of regionality, the Authority recently  
10 concluded that significant parts of BellSouth's OSS are not regional. The  
11 Authority found that BellSouth had not shown that its loop make-up process, its  
12 Legacy Systems, RSAG and ATLAS, its manual work groups, its documentation  
13 or its provisioning and maintenance and repair processes are regional. The  
14 Authority noted that its decision "was based in part on evidence that was not  
15 addressed in the FCC order . . . approving BellSouth's Georgia/Louisiana Section  
16 271 application. Order Resolving Phase I Issues of Regionality, 01-00362 at 40  
17 (Tennessee Regulatory Authority June 21, 2002). The Authority explained that  
18 an empirical analysis of performance data on percent flow through of Local  
19 Number Portability Orders for 10 months in 2001 showed statistically significant  
20 differences in performance across the region. *Id.* at 41. The Authority added that  
21 "BellSouth recommended "Percent Flow-Through" of CLECs' Local Number  
22 Portability as the best test of its performance. The handling of Local Number  
23 Portability orders does not depend on technical complexities associated with  
24 orders for unbundled network elements. Nor is it materially affected by interstate  
25 differences in technical complexities (e.g., UNE orders) of CLECs' wholesale

1 orders, local weather conditions, or local permitting requirements, factors which  
2 BellSouth has relied upon to explain interstate disparities in its performance.” *Id.*

3  
4 With respect to the Pricewaterhouse Coopers attestation, the Authority concluded  
5 that “PWC’s attestation was seriously flawed by its failure to analyze OSS code  
6 or adequately analyze actual performance data, and by its failure to review  
7 Bellsouth’s highly complex ordering process for a sufficient period of time.  
8 Further, testimony from the December 3rd through 6th Hearing convinced a  
9 majority of the Directors that BellSouth had exerted inappropriate influence on  
10 PWC’s attestation of the regionality of BellSouth’s OSS.” *Id.* at 42.

11 **Q. WHAT BEARING DOES THE CONCLUSION THAT BELL SOUTH’S OSS**  
12 **IS NOT REGIONAL HAVE ON THIS PROCEEDING?**

13 A. BellSouth cannot rely on its Georgia performance to show its OSS is ready, as it  
14 did in persuading the FCC to approve its section 271 application for Louisiana.  
15 But without such evidence, BellSouth has little basis to claim that its OSS is ready  
16 outside of Georgia. No complete third-party test has been conducted outside of  
17 Georgia, and BellSouth has relatively little experience processing UNE-P orders  
18 outside of Georgia until very recently. Florida is conducting its own third-party  
19 test of BellSouth’s OSS but that test has not yet concluded and, more importantly,  
20 may well not be testing the OSS in place in Tennessee. BellSouth does not yet  
21 have sufficient commercial experience in Tennessee to determine that its OSS is  
22 ready to process commercial volumes of orders.

23 **Q. DOES THAT CONCLUDE YOUR REBUTTAL TESTIMONY?**  
24



1 A. Yes.

CERTIFICATE OF SERVICE

I hereby certify that on the 12<sup>th</sup> day of July, 2002, a copy of the foregoing document was served on the parties of record, via hand-delivery, overnight delivery or U.S. Mail, postage prepaid, addressed as follows:

H. LaDon Baltimore, Esq.  
Farrar & Bates  
211 Seventh Ave. No., #420  
Nashville, TN 37219-1823

Charles B. Welch, Esq.  
Farris, Mathews, et al  
618 Church St., Suite 300  
Nashville, TN 37219

Jon E. Hastings, Esq.  
Boult, Cummings, et al.  
P.O. Box 198062  
Nashville, TN 37219-8062

Guy Hicks, Esq.  
BellSouth Telecommunications, Inc.  
333 Commerce Street, #2101  
Nashville, TN 37201-3300

Jim Wright, Esq.  
United Telephone-Southeast  
14111 Capital Blvd.  
Wake Forest, NC 27587

Andrew M. Klein, Esq.  
Kelley Drye & Warren, LLP  
1200 19<sup>th</sup> Street, NW  
Washington, DC 20036

Donald L. Scholes, Esq.  
Branstetter, Kilgore, Stranch & Jennings  
227 Second Ave., North  
Nashville, TN 37210-1631

Dana Shaffer, Esq.  
XO Tennessee, Inc.  
105 Molloy St.  
Nashville, TN 37201

John McLaughlin, Jr.  
Director, State Government Affairs  
KMC Telecom  
1755 North Brown Rd.  
Lawrenceville, TN 30043

Guilford Thornton, Esq.  
Stokes & Bartholomew  
424 Church Street  
Nashville, TN 37219

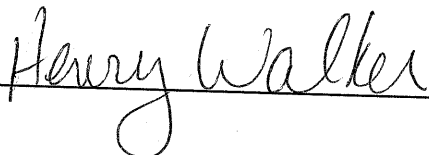
D. Billye Sanders, Esq.  
Waller, Lansden, Dortch & Davis  
511 Union Street, #2100  
Nashville, TN 37219-1750

Tim Phillips, Esq.  
Attorney General's Office  
Consumer Advocate and Protection Division  
P.O. Box 20207  
Nashville, TN 37202

AT&T Communications of the South  
Central States  
Sylvia Anderson, Esq.  
1200 Peachtree St., NE  
Room 4060  
Atlanta, GA 30309

Henry Campen  
First Union Capital Center  
150 Fayetteville St. Mall  
Suite 1400  
Raleigh, NC 27602-0389

Nanette Edwards, Esq.  
ITC^ DeltaCom  
4092 South Memorial Parkway  
Huntsville, AL 35802

  
Henry Walker